

**ROTHENBERG & CAMPBELL**

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*Attorneys for the Defendants*

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

<b>PHILIP GODLEWSKI,</b>  v.  <b>EDUARDO NICOLAS ALVEAR GONZALEZ, AKA ALVEAR GONZALEZ EDUARDO NICOLAS, AKA NICOLAS ALVEAR; and GOOD LION TV, LLC,</b>	Plaintiff,       Defendants	<b>CIVIL ACTION—LAW &amp; EQUITY (HON. JULIA K. MUNLEY)</b>  <b>JURY TRIAL DEMANDED</b>   No.: 3:24—CV—00344
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**DEFENDANTS' RESPONSE IN OPPOSITION TO PLAINTIFF'S  
MOTION FOR PRELIMINARY INJUNCTION**

**AND NOW COME** Defendants, Eduardo Nicolas Alvear Gonzalez, *aka* Alvear Gonzalez Eduardo Nicolas, *aka* Nicolas Alvear (collectively, "Individual Defendant") and Good Lion TV, LLC ("Corporate Defendant"), by and through their counsel, Rothenberg & Campbell, hereby file their Response in Opposition to Defendants' Motion for Preliminary Injunction, averring as follows:

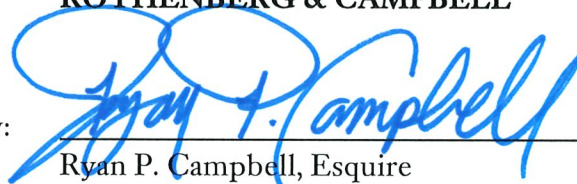
1. **NO RESPONSE REQUIRED.** Without waiving their right to challenge personal jurisdiction of this Honorable Court and adopting by reference Defendants' Motion to Dismiss Plaintiff's Complaint filed on April 4, 2024 in its entirety as if more fully set forth

at length herein, no response is required to Plaintiff's Motion for Preliminary Injunction ("Motion") pursuant to the Federal Rules of Civil Procedure as: (a) this Honorable Court lacks personal jurisdiction over Defendants; (b) Plaintiff's underlying Complaint fails to state a claim upon which relief can be granted; and (c) Plaintiff's Motion fails to conform to Fed. R. Civ. P. 7(b)(2) and 10(b) in that the Motion is not set forth in numbered paragraphs nor was a Response required pursuant to a Rule to Show Cause. (See ECF Doc. No. 16). For all other purposes of response, please see Defendants' Brief in Opposition to Plaintiff's Motion for Preliminary Injunction adopted by reference herein and filed simultaneously with the instant Response. (See ECF Doc. No. 20-1).

Respectfully Submitted,

**ROTHENBERG & CAMPBELL**

By:



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*Attorney for Defendants*

Date: April 10, 2024

**ROTHENBERG & CAMPBELL**

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**PHILIP GODLEWSKI,**

Plaintiff,

v.

**EDUARDO NICOLAS ALVEAR  
GONZALEZ, AKA ALVEAR GONZALEZ  
EDUARDO NICOLAS, AKA  
NICOLAS ALVEAR; and  
GOOD LION TV, LLC,**

Defendants

**CIVIL ACTION—LAW & EQUITY  
(HON. JULIA K. MUNLEY)**

**JURY TRIAL DEMANDED**

No.: 3:24—CV—00344

**CERTIFICATE OF SERVICE**

I, Ryan P. Campbell, Esquire, on behalf of Defendants, do hereby certify that I sent a true and accurate copy of Defendants' Response and Brief in Opposition in the above-captioned case on this **10<sup>th</sup> day of April, 2024** to the below named individuals by ECF and Electronic Mail addressed as follows:

Timothy M. Kolman, Esq.

e. [tkolman@kolmanlaw.com](mailto:tkolman@kolmanlaw.com)

**ATTORNEYS FOR PLAINTIFF**

**ROTHENBERG & CAMPBELL**

By: 

Ryan P. Campbell, Esquire

**ATTORNEY FOR DEFENDANTS**

Date: April 10, 2024